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 Attorney for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

|  |   |                                 |
|--|---|---------------------------------|
| Tatyana Silva,                         | ) | Case No: 3:23-cv-00556-ART-CLB  |
|  | ) |                                 |
| Plaintiff,                             | ) | <b>ORDER GRANTING</b>           |
|  | ) | <b>STIPULATION RE: PROTOCOL</b> |
| vs.                                    | ) | <b>RE: ANONYMOUS WITNESSES</b>  |
|  | ) |                                 |
| Panasonic Corporation of North         | ) |                                 |
| America, Inc., d/b/a/ Panasonic Energy | ) |                                 |
| Corporation of North America, Inc., a  | ) |                                 |
| Delaware corporation; and DOES 1-10,   | ) |                                 |
|  | ) |                                 |
| Defendants.                            | ) |                                 |

IT IS HEREBY STIPULATED AND AGREED by the parties' counsel of record as follows regarding the Employee 1 – Employee 7 (collectively, the “Anonymous Witnesses”) referenced in Plaintiff’s Complaint (ECF No. 1).

1. Within five days of the entry of an order relating to this Stipulation and Order, Plaintiff will disclose the names and contact information (street address, email address and telephone numbers) for the Anonymous Witnesses to allow Defendant an opportunity to investigate factual matters relating to the Anonymous Witnesses and potentially depose them in the future.

2. Defendant agrees that the true names of the Anonymous Witnesses will not be disclosed in public filings without the permission of the Anonymous Witness in question, or as may be permitted by further order of the Court.

3. With respect to any of the Anonymous Witnesses who are still employed by Defendant, unless otherwise agreed or as permitted by further order of the Court, the disclosure of the fact that they are one of the Anonymous Witnesses named in the Complaint will be limited within the Panasonic organization to: (a) personnel within the Panasonic Legal Department; (b) Office of Ethics and Compliance Investigators (who may conduct witness interviews); and (c) any other person within the organization who is a decision-maker in this case with respect to litigation strategy or settlement authority.

4. If any dispute or issue arises regarding the protocols set forth in this Stipulation and Order, the parties will proceed as outlined in Paragraph V B of Judge Baldwin's Civil Standing Order (ECF No. 9).

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IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

Dated: February 1, 2024